



December 19, 2017

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

[Submitted via FCC Electronic Comments Filing System]

Re: NOTICE OF EX PARTE PS Docket 15-91 Improving Wireless Emergency Alerts and Community-Initiated Alerting

Dear Secretary Dortch:

On December 18, 2017, representatives of the New York City Emergency Management Department (“NYCEM” or “the City”) joined representatives from the Association of Public Safety Communications Officials (“APCO”), Harris County (Texas) Office of Homeland Security and Emergency Services, the National Weather Service, and the wireless industry to participate in an *Ex Parte* conversation on the above referenced matter with and at the invitation of representatives of the Federal Communication Commission’s (“FCC”) Public Safety and Homeland Security Bureau (“Commission”).¹ A summary of our discussion is found on the following page.

NYCEM sincerely appreciates the Commission’s ongoing efforts to improve Wireless Emergency Alerts and looks forward to continuing to work with the Commission in crafting and implementing the regulatory changes necessary to enhance this critical system. Further communication on this matter may be directed to the undersigned.

Respectfully submitted,

/s/

Benjamin J. Krakauer, MPA
Assistant Commissioner, Strategy & Program Development

¹ **NYCEM Participants** – Benjamin J. Krakauer, Assistant Commissioner for Strategy and Program Development; Rachel Sulaymanov, Director of Intergovernmental Affairs, Robert DeVoogd, Esq., Agency Counsel; **Harris County (Texas) Participant** - Francisco Sanchez, Assistant to the Director and Public Information Officer; **APCO Participants** – Jeff Cohen, Mark Reddish; **National Weather Service Participant** – Mike Gerber, Hugh Schratwieser; **FCC Participants** – Lisa Fowlkes, Nicole McGinnis, Megan Henry, James Wiley, Rasoul Safavian, Anjali Singh **Industry Participants** - Mike Tan (AT&T), Rob Kubik (Samsung), Ray Rothermel (Sprint), Shellie Blakeney (T-Mobile), Eric Hagerson (T-Mobile), Grant Spellmeyer (USCellular), Bill Tortoriello (USCellular), Rob Morse (Verizon), Farrokh Khatibi (Qualcomm)





Discussions with CTIA on Geo-targeting Enhancements

NYCEM expressed its sincere appreciation for the open dialogue on improving Wireless Emergency Alerts (“WEA”) with CTIA and its member companies (“the industry” or “industry”) over the past several weeks. During these conversations, NYCEM was pleased to learn that the industry is both willing and able to improve WEA geo-targeting by utilizing existing network-level capabilities (e.g., cell sectorization) and device-based based improvements (e.g., utilizing the handset’s GPS). Further, the industry has expressed support for limiting “overshoot” of messages to 1/10th of a mile as proposed by the CSRIC V report and supported by the record.^{2,3} NYCEM recognizes industry’s point that RF propagation challenges exist which makes achieving 100% delivery difficult in *certain* circumstances (e.g., devices in basements).

NYCEM reiterated that the existing level of geo-targeting is not sufficient as clearly demonstrated by the City’s use of WEA following the Chelsea Bombing in 2016.⁴ NYCEM continues to strongly support these enhancements and encourages the Commission to adopt an implementation timeline consistent with other WEA improvements that are expected to come online in 2019. A 36-month implementation timeline is simply too long given the threat environment that local emergency management and public safety officials are operating in.

WEA Improvements Beyond Geo-targeting

NYCEM wishes to reiterate that our discussions with the industry on WEA were limited exclusively to the geo-targeting issue. While NYCEM would be willing to engage in future discussions with industry representatives on a number of the other WEA-enhancement proposals before the Commission, those discussions have not happened as of the date of this filing. NYCEM continues to strongly encourage the Commission to implement the other WEA enhancements requested by the public safety community as outlined in our prior filings on this matter including, but not limited, to:

- Incorporating multimedia into WEA messages
- Allowing “Many-to-One” (Disaster Relief Messaging) feedback collection via the WEA system
- Multilingual Messaging beyond English and Spanish
- WEA message retention
- Informed consumer choice at point of sale

² CSRIC V WEA Geo-Targeting Report at pages 31-32.

³ Further Notice of Proposed Rulemaking on Wireless Emergency Alerts and Community-Initiated Alerting at 141.

⁴ See, for example, NYCEM’s Notice of Ex Parte filed in PS Docket 15-91 Improving Wireless Emergency Alerts and Community Initiated Alerting at page 2, dated July 10, 2017.